

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CONCORD MANAGEMENT AND  
CONSULTING LLC,

Defendant.

Crim. No. 18-CR-32-2 (DLF)

**PARTIES' JOINT PROPOSED SCHEDULING ORDER**

The United States of America and Concord Management and Consulting LLC propose the attached revised pretrial scheduling order based on the template provided by the Court on August 16, 2019 (Doc. 180).

Respectfully submitted,

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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**v.**

**CONCORD MANAGEMENT AND  
CONSULTING LLC,**

**Defendant.**

**Crim. No. 18-CR-32-2 (DLF)**

**SCHEDULING ORDER**

It is ORDERED that the following schedule shall apply in this case:

1. The defendant shall file any motion(s) to suppress by November 4, 2019. The government's opposition(s) shall be filed by November 18, 2019. The defendant's reply/replies shall be filed by November 25, 2019.
2. The government shall complete any final discovery and *Brady* notice shall be October 18, 2019.
3. The parties shall jointly file proposed jury instructions by October 21, 2019. The joint filing shall specify the instructions on which the parties agree and the instructions on which the parties disagree, with specific objections noted below each disputed instruction and supporting legal authority.
4. The government shall provide expert notice by November 15, 2019. The defense shall provide expert notice by December 13, 2019.
5. The government shall provide Rule 404(b) notice by November 15, 2019. The defendant shall respond to any Rule 404(b) notice by December 13, 2019.

6. The government shall provide the defense with an exhibit list and copies of exhibits by January 15, 2020.
7. The government shall file any motion under the Classified Information Procedures Act by January 22, 2020.
8. The parties shall jointly file a proposed *voir dire* and jury questionnaire by January 29, 2020. The joint filing shall specify the questions on which the parties agree, and the questions on which the parties disagree, with specific objections noted below each disputed question and supporting legal authority.
9. The government shall provide the defense with a witness list and any *Giglio* and *Jencks* material by February 3, 2020.
10. The defense shall provide the government with a witness list, exhibit list, and copies of exhibits by February 10, 2020.
11. Each party shall serve any expert reports by December 13, 2019.
12. Motions in limine shall be filed by February 7, 2020. Oppositions to motions in limine shall be filed by February 21, 2020. Replies shall be filed by February 28, 2020.
13. Any stipulations shall be filed by March 2, 2020.
14. The Court will hold a pretrial conference on March 9, 2020.
15. Trial will begin on April 6, 2020.

SO ORDERED.

DABNEY FRIEDRICH  
United States District Judge

Dated: \_\_\_\_\_